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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

AMERICAN GUARANTEE AND  
LIABILITY INSURANCE COMPANY

Plaintiff,

vs.

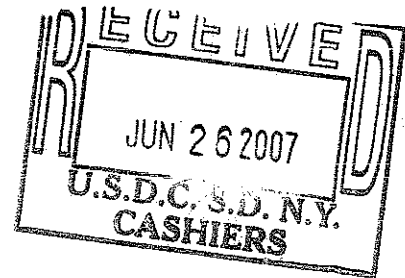
GERALD M. LEMUS, Individually, and  
JOHN R. WATSON, Individually,

Defendants.

JUDGE BATTS

07 CIV 6038

Case No. \_\_\_\_\_



RULE 7.1 DISCLOSURE STATEMENT

Plaintiff AMERICAN GUARANTEE AND LIABILITY INSURANCE  
COMPANY ("American"), by and through undersigned counsel, hereby submits the  
following Disclosure Statement pursuant to Rule 7.1 of the Federal Rules of Civil  
Procedure:

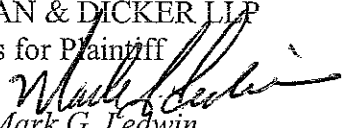
1. Plaintiff American is a wholly owned subsidiary of Zurich American  
Insurance Company, which in turn is a subsidiary of Zurich Financial Services, a publicly  
traded company.

Dated: June 19, 2007

Respectfully submitted,

WILSON, ELSER, MOSKOWITZ,  
EDELMAN & DICKER LLP

Attorneys for Plaintiff

By:   
/s/ Mark G. Ledwin

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